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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RUTH APPLE,

Plaintiff,

vs.

CSAA GENERAL INSURANCE dba AAA
INSURANCE; CSAA INSURANCE
EXCHANGE dba AAA INSURANCE; and
ROE Business Entities I-X,

Defendants.

Case No. 2:19-cv-01093-RFB-DJA

STIPULATION AND ORDER TO:

- (1) EXTEND TIME FOR NON-PARTY
DANE STREET, LLC TO
RESPOND TO PLAINTIFF'S
MOTION TO COMPEL
COMPLIANCE WITH RULE 45
SUBPOENA (ECF No. 57) (FIRST
REQUEST)**
- (2) WITHDRAW NON-PARTY'S
DANE STREET, LLC'S MOTION
TO EXTEND TIME (ECF NO. 58)**

Non-Party Dane Street, LLC ("Dane Street"), by and through its counsel of record, Jackson Lewis, P.C., Plaintiff Ruth Apple, by and through her counsel of record, Mainor Wirth, LLP, and Defendants CSAA General Insurance d/b/a AAA Insurance, and CSAA Insurance Exchange dba AAA Insurance, by and through their counsel of record, McCormick, Barstow, Sheppard, Wayte & Carruth, LLP, hereby stipulate and agree as follows:

1. On April 26, 2021, Plaintiff filed a Motion to Compel Non-Party Dane Street, LLC's Compliance with Rule 45 Subpoena. ECF No. 57. Dane Street's response was due on May 10, 2021.
2. On May 10, 2021, Dane Street filed a Motion to Extend the Time for it to Respond to Plaintiff's Motion. ECF No. 58. Dane Street requested until May 26, 2021 to file the response as Plaintiff's subpoena encompasses 19 deposition topics and 19 categories of documents to be

1 produced. Dane Street is working to address each of these collective 38 topics in its response to
2 Plaintiff's Motion. Additionally, Dane Street's counsel's review of potentially responsive
3 documents sought by Plaintiff's subpoena is taking longer than anticipated due to the volume of
4 materials and counsel's obligations in other matters. The review of these materials is necessary for
5 Dane Street to respond to the arguments made in Plaintiff's Motion to Compel. Further, Dane
6 Street's counsel will be out of the office on a previously-planned time off from May 14 – May 23,
7 2021.

8 3. The parties have agreed that Dane Street shall have until May 26, 2021 to file its
9 response to Plaintiff's Motion.

10 4. As a result, Dane Street's Motion to Extend (ECF No. 58) shall be withdrawn
11 without prejudice.

12 5. Nothing in this Stipulation shall operate to waive or concede any claim, defense or
13 argument.

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1 6. This stipulation is made in good faith and not for the purpose of delay.

2 Dated this 14th day of May, 2020.

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4 MAINOR WIRTH, LLP

JACKSON LEWIS P.C.

5 /s/ James D. Urrutia
6 James D. Urrutia, Esq.
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10 6018 S. Ft. Apache Rd., Ste. 150
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/s/ Joshua A. Sliker
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Attorneys for Plaintiff

10 MCCORMICK, BARSTOW, SHEPPARD,
11 WAYTE & CARRUTH, LLP

12 /s/ Jonathan Carlson
13 Jonathan Carlson, Esq.
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15 8337 West Sunset Road, Ste 350
16 Las Vegas, Nevada 89113

Attorneys for Defendants

17 **ORDER**

18 IT IS SO ORDERED:

19 
20 UNITED STATES MAGISTRATE JUDGE

21 Dated: May 17, 2021

22 Case No. 2:19-cv-01093-RFB-DJA